

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

DEBORAH YOUNG, as Special  
Administrator of the Estate of  
Gwendolyn Young, deceased,

Plaintiff,

v.

CORRECTIONAL HEALTHCARE  
COMPANIES, INC., and ANDREW  
ADUSEI, M.D.,

Defendants.

Case No. 13-CV-315-IDJ-JFJ

**REQUEST FOR CLARIFICATION OF MINUTE ORDER ECF 708**

COMES NOW, Defendant, CORRECTIONAL HEALTHCARE COMPANIES, LLC, (hereinafter “CHC”), by and through its counsel, to request clarification of Minute Order ECF 708.

On February 28, 2023, the Court entered an Order (ECF No. 708) requiring all parties, counsel, and “at least three board members of Wellpath” to attend a status conference, the date and time of which is to be determined after conferral by the parties. Counsel for Defendant CHC called the Court to inquire regarding the Order, given that no entity with the name Wellpath is a party to this action. Court staff indicated that the Order is correct.

CHC respectfully requests clarification of ECF No. 708. Jurisdiction does not extend to entities with the name Wellpath or to the parent company of Defendant CHC, Jessamine Healthcare, Inc.<sup>1</sup> *E.g., Harris v. Am. Int'l Group, Inc.*, 923 F. Supp. 2d 1299 (W.D. Okla, 2013).

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<sup>1</sup> As disclosed to the Court, Defendant CHC is wholly owned by CHC Companies, LLC, a Delaware limited liability company, which is wholly owned by Correctional Healthcare Holding Company, LLC, a Delaware limited liability company. Jessamine Healthcare, Inc., a Delaware corporation, is the parent company of these CHC entities. ECF No. 689.

However, Defendant CHC will make three board members of Jessamine Healthcare, Inc., available to attend the upcoming status conference, without conceding the Court's jurisdiction over any entity not a party to this case.

WHEREFORE, Defendant CHC, through its counsel, respectfully requests this Honorable Court clarify whether the appearance of three board members of Jessamine Healthcare, Inc., Defendant CHC's parent company, without conceding jurisdiction over any entity not a party to this case, is sufficient for purposes of the upcoming status conference.

Respectfully Submitted,  
CHAPMAN LAW GROUP

Dated: March 3, 2023

s/ Ronald W. Chapman Sr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 3, 2023, I electronically transmitted the forging document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

s/ Ronald W. Chapman Sr.  
Ronald W. Chapman Sr. M.P.A., LL.M.  
(P37603)